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June 3, 2025

**Via ECF**

Honorable Harvey Bartle III, U.S.D.J.  
United States District Court for the  
Eastern District of Pennsylvania  
16614 U.S. Courthouse  
601 Market Street  
Philadelphia, Pennsylvania 19106

**Re: *Atlas Data Privacy Corporation, et al., v. Melissa Data Corp., et al.,***  
**Case No. No. 1:24-cv-04292-HB**  
**Joinder in Defendants' Reply Brief for the Consolidated Motion to Dismiss**  
**Plaintiff's Complaint Pursuant to Rule 12(b)(6)**

Dear Judge Bartle:

This firm represents defendant Melissa Data Corporation ("Melissa") in the above-referenced matter. We write to advise the Court that Melissa joins the Reply Brief for the Consolidated Motion to Dismiss under Fed. R. Civ. P. 12(b)(6), which was filed on June 3, 2025 in the action captioned as *Atlas Data Privacy Corp., et al. v. DM Group Inc., et al.*, No. 1:24-cv 04075 (ECF 72) (the "Reply Brief"). For the reasons set forth in the Reply Brief and the Consolidated Motion to Dismiss moving papers, Defendant respectfully requests that the Court grant the motion and dismiss Plaintiffs' Complaint in this matter with prejudice.

Respectfully submitted,

/s/ Michael P. O'Mullan

Michael P. O'Mullan

cc: All counsel via ECF.

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